

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
LAMAR WILSON	:	VIOLATIONS:
	:	21 U.S.C. § 841(a)(1) (possession
	:	with intent to distribute 5 grams or more
	:	of cocaine base (“crack”) -1 count)
	:	18 U.S.C. § 924(c)(1)(A) (possession of a
	:	firearm in furtherance of a drug
	:	trafficking crime -1 count)
	:	18 U.S.C. § 922(g)(1) (possession of a
	:	firearm by a convicted felon -1 count)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about September 4, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

LAMAR WILSON

knowingly and intentionally possessed with intent to distribute five grams or more, that is, approximately 37.76 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 4, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

LAMAR WILSON

knowingly possessed a firearm, that is:

1. A Maadi/Helwan Model AK 47 semi-automatic rifle, caliber 7.62x39mm, serial number AC0046875;
2. Smith and Wesson semi-automatic pistol, Model 909, caliber 9mm luger, serial number VCZ5114;
3. two metal magazines, loaded with 15 live Wolf cartridges, caliber 7.62x39mm, and 23 live Remington cartridges, caliber 7.62x39mm, for a total of 38 rounds; and
4. one metal magazine loaded with nine live Remington 9mm cartridges.

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, distribution of a cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 4, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

LAMAR WILSON,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is,

1. A Maadi/Helwan Model AK 47 semi-automatic rifle, caliber 7.62x39mm, serial number AC0046875;
2. Smith and Wesson semi-automatic pistol, Model 909, caliber 9mm luger, serial number VCZ5114;
3. two metal magazines, loaded with 15 live Wolf cartridges, caliber 7.62x39mm, and 23 live Remington cartridges, caliber 7.62x39mm, for a total of 38 rounds; and
4. one metal magazine loaded with nine live Remington 9mm cartridges.

In violation of Title 18, United States Code, Sections 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 924(c) and 922(g)(1), set forth in this indictment, defendant

LAMAR WILSON

shall forfeit to the United States of America the firearms and ammunition involved in the commission of these offenses, including, but not limited to:

1. A Maadi/Helwan Model AK 47 semi-automatic rifle, caliber 7.62x39mm, serial number AC0046875;
2. Smith and Wesson semi-automatic pistol, Model 909, caliber 9mm luger, serial number VCZ5114;
3. two metal magazines, loaded with 15 live Wolf cartridges, caliber 7.62x39mm, and 23 live Remington cartridges, caliber 7.62x39mm, for a total of 38 rounds; and
4. one metal magazine loaded with nine live Remington 9mm cartridges.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

**_____
GRAND JURY FOREPERSON**

**_____
LAURIE MAGID
United States Attorney**